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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

PAULETTE WALKER PERRY,  
  
Petitioner,  
  
vs.  
  
DWIGHT NEVEN, *et al.*,  
  
Respondents.

Case No. 2:18-cv-01573-RFB-VCF

**UNOPPOSED MOTION FOR  
ENLARGEMENT OF TIME (FIRST  
REQUEST)**

Respondents, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, hereby respectfully move this Court for an order granting a 60-day enlargement of time, to and including August 23, 2022, to respond to Paulette Perry's ("Perry") amended habeas corpus petition (ECF No. 30).

This motion is based upon the provisions of Rule 6(b) of the Federal Rules of Civil Procedure and the attached Declaration of Counsel, as well as all other papers, documents, records, pleadings and other materials on file herein.

Respondents have not requested any prior enlargements of time to respond to Perry's amended petition. The current response due date is June 24, 2022. This motion is made in good faith and not for the purposes of delay.

RESPECTFULLY SUBMITTED this 14th day of June, 2022.

AARON D. FORD  
Attorney General

By: /s/ Geordan Goebel  
GEORDAN GOEBEL (Bar. No. 13132)  
Deputy Attorney General

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**DECLARATION OF COUNSEL**

I, Geordan Goebel, hereby state, based on personal knowledge, that the assertions of this declaration are true:

1. I am a Deputy Attorney General employed by the Attorney General's Office of the State of Nevada in the Post-Conviction Division (PCD), and I make this declaration on behalf of Respondents' motion for enlargement of time.

2. By this motion, I am requesting a sixty (60) day enlargement of time, to and including August 23, 2022, in which to file and serve a response to Paulette Perry's amended habeas corpus petition. This is my first request for an enlargement of time to respond to Perry's amended petition. This extension of time is necessary for me to properly prepare a response to the petition. I contacted petitioner's counsel Sandra Gillies if she had any objections to this request. Ms. Gillies had no objections, and graciously agreed to my request for this extension of time.

3. This enlargement of time request was prompted by the currently approaching response due date of June 24, 2022. I have responses to two other federal habeas petitions due in the next three weeks, and our office has not, to date, obtained all the exhibits and records in this case, nor completed the

1 exhibit list to accompany our response. Additionally, our office is currently secretarially short staffed,  
2 which adversely impacts our ability to prepare and file pleadings. The additional time is necessary to  
3 properly and timely prepare a response to Perry's petition.

4 4. This motion for enlargement of time is made in good faith and not for the purpose of  
5 unduly delaying the ultimate disposition of this case.

6 5. Pursuant to 28 U.S.C. § 1746, I hereby certify, under penalty of perjury, that the  
7 foregoing is true and correct.

8 Executed on this 14th day of June, 2022.

9 /s/ Geordan Goebel  
10 GEORDAN GOEBEL

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13 **ORDER**

14 IT IS SO ORDERED.

15 Dated this 14th day of June, 2022.

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19 **RICHARD E. BOULWARE, II**  
20 **United States District Court**  
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**CERTIFICATE OF SERVICE**

I certify that I am an employee of the Office of the Attorney General and that on this 14th day of June, 2022, I served a copy of the foregoing **UNOPPOSED MOTION FOR ENLARGEMENT OF TIME (FIRST REQUEST)** by U.S. District Court CM/ECF electronic filing to:

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/s/ Amanda White